

## **REMARKS**

The Examiner is thanked for the careful review of this Application. Claims 1-16 and 24-28 are pending after entry of the present Amendment. Amendments were made to the claims in response to the Office's rejections and to better define the invention. The amendments do not introduce new matter.

### **Rejections under 35 U.S.C. § 112, Second Paragraph:**

The Office has rejected claims 1-16 and 24-28 under 35 U.S.C. § 112, second paragraph for failing to particularly point out and distinctly claim the subject matter which the Applicants regard as the invention. The Applicants respectfully request that section 112, second paragraph rejection of claims be withdrawn in view of the clarifying amendments to the claims.

The Office has rejected claims 1, 10, 12, 24, and 26 as being unclear with respect to the meaning of the phrase "the fluid menisci including a chemistry." In accordance with the Office's instruction, claims 1, 10, 12, 24, and 26 have been amended and the term "including" has been replaced with the phrase "being formed using." Furthermore, in accordance with the Office's instructions, the Applicants have amended claim 13 to recite "back fluid meniscus." Claim 14 has been amended to specifically recite that the front chemistry is configured to be compatible with the brush scrubbing chemistry so as to prevent chemical contamination of the front surface of the semiconductor substrate."

The Office has further rejected claim 2 for being unclear as to the manner the chemistry of the back meniscus prevents contamination of the front surface of the semiconductor substrate. While the Applicants believe that claim 2 is clear when read in view of the specification, to expedite prosecution and to overcome the Office's rejections, the Applicants have amended claim 2 to recite that the chemistry included in the front meniscus being compatible with the brush scrubbing chemistry prevents chemical contamination of the front surface of the semiconductor substrate.

The Office has further rejected claim 6 for being unclear. In accordance with the Office's instruction, the Applicants have amended claim 6, and have replaced the terms "front fluid meniscus" and "back fluid meniscus" with "a chemistry of the front fluid meniscus" and "a chemistry of the back fluid meniscus, respectively.

The Office has further rejected claims 10 and 24 for having indefinite preambles. The Applicants, however, respectfully traverse the Office's interpretation that it is unclear what the substrate surface are being prepared for. The Applicants further traverse the Office's suggestion that the term "preparing" be replaced with the term "cleaning," as making such amendment unnecessarily narrows the scope of the claims.

It is respectfully submitted that the term "preparing," as used in the claimed invention, is clear and definite when read in light of the specification and given the respective broadest reasonable interpretation consistent with the specification. *In re Hyatt*, 211 F.3d 1367, 1372, 54 USPQ2d 1664, 1667 (Fed. Cir. 2000). For instance, in several paragraphs of the subject specification, the Applicants have referred to preparing the substrate by cleaning and/or drying of the substrate surfaces. For instance on page 10, paragraph 31:

In one embodiment, a substrate is prepared by performing a brush scrubbing operation on a substrate backside using a brush chemistry followed by proximity cleaning and/or drying of the substrate front side and backside using chemistries compatible with the brush scrubbing chemistry. [Emphasis added.]

Thus, in the claimed invention, preparing the substrate surface can include cleaning, drying, or cleaning and drying the substrate surfaces. Furthermore, one of ordinary skill in the art in the field of semiconductor manufacturing is well aware that semiconductor fabrication and manufacturing involves several preparation operations. Furthermore, as provided in paragraph 92 of the claimed invention, the system and methods of the claims invention can prepare the semiconductor substrates for several different types of processes (e.g., etching chamber, CVD system, PVD system, ECD system, ALD system lithographic processing system, etc.). In view of the aforementioned, contrary to the Office's interpretation, the term "preparing," as used in the claimed invention is clear.

It is respectfully submitted that rejections of claims 1, 2, 6, 10, 12, 14, 24, and 26 are moot in view of the clarifying amendments. Accordingly, the Applicants respectfully request that rejection of the claims 1-16 and 24-28 under 35 U.S.C. section 112, second paragraph be withdrawn.

The Applicants hereby submit that the clarifying amendments were made in response to the Office's rejections not presented in the first Office Action. As such, the subject Amendment complies with 37 C.F.R. 1.116(b) and should be entered.

In view of the foregoing, the Applicants respectfully submit that all of the pending claims 1-16 and 24-28 are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 774-6913. If any additional fees are due in connection with the filing of this paper, the Commissioner is authorized to charge such fees to Deposit Account No. 50-0805 (Order No. LAM2P463).

Respectfully submitted,  
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